

Scott M. Berman
Jeffrey C. Fourmaux
FRIEDMAN KAPLAN SEILER & ADELMAN LLP
7 Times Square
New York, New York 10036
Telephone: (212) 833-1100
E-mail: sberman@fklaw.com
jfourmaux@fklaw.com

Hearing Date: Sept. 14, 2022
Hearing Time: 10:00 a.m.
Opposition Date: June 17, 2022
Reply Date: July 29, 2022

Attorneys for Defendant Pierre Delandmeter

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

UBS AG, UBS EUROPE SE (f/k/a UBS
(LUXEMBOURG) SA), UBS FUND SERVICES
(LUXEMBOURG) SA, UBS THIRD PARTY
MANAGEMENT COMPANY SA, ACCESS
INTERNATIONAL ADVISORS LLC, ACCESS
INTERNATIONAL ADVISORS LTD., ACCESS
MANAGEMENT LUXEMBOURG SA (f/k/a
ACCESS INTERNATIONAL ADVISORS
(LUXEMBOURG) SA) as represented by its

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04285 (CGM)

Liquidator MAITRE FERNAND ENTRINGER,
ACCESS PARTNERS SA as represented by its
Liquidator MAITRE FERNAND ENTRINGER,
PATRICK LITTAYE, CLAUDINE MAGON DE LA
VILLEHUCHET (a/k/a CLAUDINE DE LA
VILLEHUCHET) in her capacity as Executrix under
the Will of THIERRY MAGON DE LA
VILLEHUCHET (a/k/a RENE THIERRY DE LA
VILLEHUCHET), CLAUDINE MAGON DE LA
VILLEHUCHET (a/k/a CLAUDINE DE LA
VILLEHUCHET) individually as the sole beneficiary
under the Will of THIERRY MAGON DE LA
VILLEHUCHET (a/k/a RENE THIERRY DE LA
VILLEHUCHET), PIERRE DELANDMETER,
THEODORE DUMBAULD, LUXALPHA SICAV as
represented by its Liquidators MAITRE ALAIN
RUKAVINA and PAUL LAPLUME, MAITRE
ALAIN RUKAVINA AND PAUL LAPLUME, in
their capacities as liquidators and representatives of
LUXALPHA, , GROUPEMENT FINANCIER LTD.,

Defendants.

**NOTICE OF HEARING ON DEFENDANT PIERRE DELANDMETER'S
MOTION TO DISMISS SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that on April 22, 2022, defendant Pierre Delandmeter ("Delandmeter"), by and through its undersigned counsel, filed a motion for an order dismissing the Second Amended Complaint filed by plaintiff Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC and the Chapter 7 Estate of Bernard L. Madoff, pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), as made applicable by Rule 7012 of the Federal Rules of Bankruptcy Procedure (the "Motion"). The Motion will be heard before the Honorable Cecelia G. Morris, United States Bankruptcy Judge for the United States Bankruptcy Court, Southern District of New York, on **September 14, 2022 at 10:00 a.m. (prevailing Eastern time)** (the "Hearing"), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's directive, all hearings will be conducted remotely pending further Order of the Court. All parties who wish to participate in the Hearing must refer to Judge Morris's guidelines for remote appearances and are required to make arrangements to appear via ZoomGov. For further details on ZoomGov, please call the Courtroom Deputy at (845) 451-6367. Further instructions regarding remote appearances via ZoomGov can be found on the Court's website at <https://www.nysb.uscourts.gov/zoom-video-hearing-guide>.

PLEASE TAKE FURTHER NOTICE that if you oppose the relief requested in the Motion you are required to file a written response ("Opposition"), and to serve the Opposition on Delandmeter's counsel Friedman Kaplan Seiler & Adelman LLP, 7 Times Square, New York, NY 10036-6516, Attn: Scott M. Berman, Esq., sberman@fklaw.com, so that it is received by **June 17, 2022** (the "Opposition Deadline"). Delandmeter shall file his reply by July 29, 2022.

PLEASE TAKE FURTHER NOTICE that if no Opposition is timely served with respect to the Motion, Delandmeter may, on or after the Opposition Deadline, submit to the Bankruptcy Court a proposed order granting the relief sought in the Motion.

PLEASE TAKE FURTHER NOTICE that you need not appear at the Hearing if you do not object to the relief requested in the Motion.

[Remainder of page intentionally left blank]

Dated: New York, New York
April 22, 2022

FRIEDMAN KAPLAN SEILER
& ADELMAN LLP

By: /s/ Scott M. Berman
Scott M. Berman
Jeffrey C. Fourmaux
7 Times Square
New York, New York 10036
Telephone: (212) 833-1100
E-mail: sberman@fklaw.com
jfourmaux@fklaw.com

Attorneys for Defendant Pierre Delandmeter